

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Revision of the Commission's Rules)	CC Docket No. 94-102
to Ensure Compatibility with)	
Enhanced 911 Emergency Calling Systems)	
)	
)	

CenturyTel, Inc.
Report on Implementation of Wireless E911 Phase II
Automatic Location Identification

As requested by the Commission, CenturyTel, Inc. ("CenturyTel") hereby submits its Report on Implementation of Wireless E911 Phase II, Automatic Location Identification, on behalf of its affiliated commercial mobile radio service ("CMRS") carriers.

I. Background Contact Information

A. Carrier Identifying Information

CenturyTel submits this report on behalf of its affiliated wireless carriers listed in Exhibit A. CenturyTel provides wireless service primarily in rural markets.

B. Contact Information

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II. E911 Phase II Location Technology Information

A. Type of Technology

CenturyTel has elected to utilize a network-based solution to the Commission's Automatic Location Identification ("ALI") requirements under Phase II of E911 implementation. CenturyTel is in the process of selecting a vendor for provision of a network-based technology. In particular, CenturyTel is currently reviewing its options with the following vendors: Sigma-One Communications, Grayson Wireless, and TruePosition.

As mentioned previously, CenturyTel provides wireless service primarily in rural markets. In selecting an E911 location technology, CenturyTel sought as much information as possible concerning available handset-based E911 technologies. As the Commission has recognized, handset-based E911 ALI technology appears to be the most logical solution for implementation of Phase II requirements in rural wireless markets. Implementation of handset-based solutions was expected to cost significantly less in comparison to use of network-based solutions.

However, after speaking with representatives of various equipment vendors, it is CenturyTel's opinion that no viable handset-based solution exists on the market today, and that no such solution will become available in time to meet the Commission's E911 Phase II implementation deadlines. CenturyTel attempted to identify handset-based solutions from Audiovox, Motorola, and Nokia. Although CenturyTel sought confirmation from these companies, on numerous occasions, as to the availability of handset-based ALI products, none of these vendors provided CenturyTel with any confirmation, whether by telephone, e-mail, or in written form, as to whether they had such products available at all, much less what the time frame might be for providing such products. Thus, despite the significant drawbacks of a network-based solution, particularly the high costs involved in implementation, CenturyTel has determined that at this time, given the Commission's requirements

and deadlines, CenturyTel has no other choice but to use a network-based technology for provision of ALI.

CenturyTel takes this opportunity to reiterate its grave concern over the dilemma that rural wireless carriers are facing with respect to Phase II E911 implementation. As the Commission is aware, the lack of state cost-recovery mechanisms for Phase II implementation (and any FCC requirement for such mechanisms) forces rural carriers to bear the entire burden for such implementation. It appears that the Commission relied in part on its expectations that a handset-based solution would become available for rural carriers. CenturyTel agrees with the Commission that a handset-based technology would significantly lessen the financial strain expected in meeting the Commission's Phase II E911 requirements.

However, given that no vendor, to the best of CenturyTel's knowledge, has stepped forward with a handset-based solution to be made available in the foreseeable future, CenturyTel must, at this time, plan on utilizing a network-based solution. CenturyTel respectfully submits to the Commission that it makes this choice with extreme reluctance. Implementation of a network-based solution, as costly as it is, is even more costly for rural carriers because of the manner in which their base stations are configured within their systems. Based on discussions with the three vendors CenturyTel is considering, CenturyTel has calculated that use of a network-based solution will likely cost approximately \$30,000 per base station to implement in metropolitan service areas, and approximately \$42,000 per base station in rural service areas. Approximately 70% of CenturyTel's wireless service areas are in rural regions, with the remaining 30% in smaller metropolitan areas. CenturyTel therefore tentatively estimates its total implementation costs at approximately \$35 million under a network based solution; given that CenturyTel has approximately 750,000 subscribers, the costs would be approximately \$40.93 per subscriber. Thus, further exacerbating CenturyTel's

financial burden is the fact that typically, its rural systems have fewer subscribers in comparison to metropolitan areas. The lack of a cost recovery mechanism completes CenturyTel's somber outlook on this issue.

B. Testing and Verification

CenturyTel is in the process of identifying a vendor to provide a network-based solution for its primarily rural wireless markets. CenturyTel intends to comply with OET Bulletin No. 71 with respect to testing and verification methods used to determine the accuracy of the ALI solution selected.

C. Implementation Details and Schedule

In implementing a network-based solution, CenturyTel expects to use an ALI system that would be an overlay network, including (1) wideband receivers co-located within each cellular base station within a requesting Public Safety Answering Point's ("PSAP's") boundaries; (2) collection and analyzing equipment co-located within the Mobile Switching Center ("MSC"); and (3) an interface into a third-party Mobile Positioning Center ("MPC") to the network-based location system at each MSC.

CenturyTel is in the process of identifying a vendor to provide a network-based solution. As soon as a vendor is identified, CenturyTel will work closely with that vendor to establish a feasible implementation schedule.

D. PSAP Interface

With respect to the hardware that interfaces with the PSAP, CenturyTel plans to utilize hardware that would constitute a third-party MPC interfacing to both the MSC and the network-based location system via a standard PN3890 interface. Interface to the PSAP would be specific to, and dependent on, the requirements of the third-party MPC provider (such as SCC Communications).

E. Existing Handsets

As explained previously, CenturyTel intends at this time to utilize a network-based solution to implement the FCC's Phase II ALI requirements. As a consequence, CenturyTel does not, at this time, intend to establish a strategy for upgrading or replacing existing customer handsets, other than as normally occurs present.

F. Location of Non-Compatible Handsets

Because CenturyTel has elected to utilize a network-based solution for purposes of implementing Phase II E911, CenturyTel expects that existing customer handsets will be compatible with such a solution. As a consequence, no plan for locating incompatible handsets will be necessary.

G. Other Information

At this time, CenturyTel has not received any PSAP requests for Phase II E911 implementation.

CENTURYTEL, INC.

Nancy Killien Spooner
Counsel for CenturyTel, Inc.

November 9, 2000

EXHIBIT A

CenturyTel, Inc. submits this report on behalf of the carriers listed below. These carriers report TRS under the TRS number of CenturyTel Wireless, Inc., a parent holding company; that TRS number is 806033.

Cellular

Appleton-Oshkosh-Neenah-MSA Limited Partnership
Cellular Mobile Systems of Michigan RSA 7 Limited Partnership
Cellular North Michigan Network General Partnership
Cellunet of Biloxi, Inc.
Century Cellunet of Alexandria, Inc.
Century Cellunet of Arkansas RSA 12 Cellular Limited Partnership
Century Cellunet of LaCrosse Limited Partnership
Century Cellunet of Louisiana RSA #4 Cellular LP
Century Cellunet of Michigan RSA 4, Inc.
Century Cellunet of Michigan RSA 6 Cellular Limited Partnership
Century Cellunet of Mississippi RSA 2, Inc.
Century Cellunet of Mississippi RSA 6, Inc.
Century Cellunet of Mississippi RSA 7, Inc.
Century Cellunet of North Arkansas Cellular Limited Partnership
Century Cellunet of North Louisiana Cellular LP
Century Cellunet of Pine Bluff, Inc.
Century Cellunet of Saginaw Limited Partnership
Century Cellunet of Southern Michigan Cellular Limited Partnership
Century Cellunet of Southwest Arkansas Cellular LP
CenturyTel Wireless of Mississippi RSA 5, LLC
Eau Claire Cellular Telephone LP
Jackson Cellular Telephone Company, Inc.
Michigan RSA 9 Limited Partnership
Pacific Telecom Cellular of Michigan, Inc.
Pascagoula Cellular Partnership
Wisconsin RSA 1 Limited Partnership
Wisconsin RSA 2 Partnership
Wisconsin RSA 4 Limited Partnership
Wisconsin RSA 6 Limited Partnership
Wisconsin RSA 7 Limited Partnership
Wisconsin RSA 8 Limited Partnership

PCS

Century Personal Access Network, Inc.
MVI Corp.
Wisconsin RSA #7, LP